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In the U.S. District Court
Southern District of New York

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4

Ashot Egiazaryan

5

v.

6

Peter Zalmayev

7

8

November 10, 2011

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DEPOSITION OF:

10

Douglas Bloomfield,

11

a witness, called by counsel pursuant to notice,
commencing at 10:02 a.m., which was taken at the
Sperduto Law Firm, 1133 20th Street, NW, Washington,
DC 20036

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1 **relative to the first call you had with**
2 **Mr. Akhmetshin?**

3 A. Probably the same week after I had read
4 the material.

5 **Q. When you say "read the material," that's**
6 **the material that Mr. Akhmetshin sent to you,**
7 **correct?**

8 A. Plus, yes.

9 **Q. You say "plus." What else did you read?**

10 A. I did my own research.

11 **Q. What kind of research did you do?**

12 A. I went on the internet, I looked at
13 articles there, I looked at some news media, I did
14 searches for whatever news coverage there had been,
15 I saw Mr. Egiazaryan's web page and Mr. Zalmayev's
16 web page.

17 I spoke to some friends on the Hill, I can't
18 recall exactly who, to ask if they knew anything
19 about this.

20 **Q. What did your friends on the Hill say?**

21 A. They were not familiar with the specific
22 case. They were familiar with Mr. Zhirinovsky and
23 his party.

24 **Q. Now, did you undertake this project free**
25 **of charge?**

1 A. No.

2 Q. Were you compensated?

3 A. Yes.

4 Q. How much were you compensated for this
5 project?

6 A. Initially \$10,000.

7 Q. How was the \$10,000 paid to you?

8 A. By check.

9 Q. Whose check was it?

10 A. From the EDI, or the Eurasian Democracy
11 Institute. I'm not positive of the precise name.

12 Q. Would it be Eurasia Democracy Initiative?

13 A. Yes.

14 Q. You said initially it was \$10,000. Did
15 there come a time when there were additional
16 charges?

17 A. Yes.

18 Q. In total how much by way of additional
19 charges did you receive?

20 A. 10,000.

21 Q. So in total for this project you received
22 \$20,000?

23 A. Yes.

24 Q. Was the second check -- withdrawn.

25 Was the second \$10,000 also by check?

1 A. Just random notes.

2 Q. 12D states: "Detail his record as
3 antidemocratic, anti-Semitic."

4 Do you see that?

5 A. Yes.

6 Q. As of February 4, 2011 did you have any
7 understanding of what Mr. Egiazaryan's anti-Semitic
8 record was?

9 A. Whatever information I had was based on my
10 conversations with these two men.

11 Q. When you say "these two men," you mean
12 Akhmetshin and Zalmayev?

13 A. Correct.

14 Q. What Mr. Zalmayev and Mr. Akhmetshin told
15 you, you had no independent knowledge of
16 Mr. Egiazaryan's antidemocratic record, correct?

17 A. Not beyond his association with
18 Mr. Zhirinovsky.

19 Q. Prior to February 4, 2011 were you aware
20 that Mr. Egiazaryan had any affiliation with
21 Mr. Zhirinovsky?

22 A. No.

23 Q. Now, during the course of this project did
24 you ever come to learn of any statement made by
25 Mr. Egiazaryan that was anti-Semitic?

1 A. I don't recall.

2 Q. During the course of this project did you
3 ever come to learn of any statement made by
4 Mr. Egiazaryan that indicated he was anti-American?

5 A. I don't recall.

6 Q. I'd like to turn to page 484 in that
7 document.

8 The top of the page it says "H: Subject is
9 living in LA area and is considered by client as
10 anti-Semitic. Make sure to brief appropriate Jewish
11 media."

12 Let me stop there. Did I read that
13 accurately?

14 A. Yes. These are just random notes.

15 Q. These are your ideas, correct, the ones I
16 just read out?

17 A. Apparently.

18 Q. The subject referred to in exhibit H is
19 Mr. Egiazaryan, correct?

20 A. Yes.

21 Q. And the client referred to in the portion
22 that I just read was who?

23 A. The EDI.

24 Q. When it says "is considered by client as
25 anti-Semitic," what basis was given for that?

1 A. I presume that's based on the statements
2 that he had made to me in conversations.

3 Q. That wasn't my question.

4 My question was, and it was a poor question
5 on my part, my question was did you understand what
6 the basis was for the statement made to you that in
7 the client's view Mr. Egiazaryan was anti-Semitic?

8 A. What the client had told me was of his
9 involvement with Zhirinovsky and Zhirinovsky's party
10 and his role in it.

11 That's what he had told me.

12 Q. Other than his involvement with
13 Zhirinovsky and Zhirinovsky's party and his role in
14 it, did Mr. Zalmayev tell you anything else that
15 would have supported a claim by him that
16 Mr. Egiazaryan is anti-Semitic?

17 A. I don't recall.

18 Q. During these conversations -- withdrawn.

19 During the course of the entire project,
20 apart from Mr. Egiazaryan's involvement with
21 Mr. Zhirinovsky, Zhirinovsky's party and
22 Mr. Egiazaryan's role in it, did Mr. Zalmayev ever
23 give you any other basis to suggest that
24 Mr. Egiazaryan was an anti-Semite?

25 A. I don't recall. I'm not sure.

1 Q. The same question with respect to
2 Mr. Akhmetshin.

3 During the course of this project and apart
4 from Mr. Egiazaryan's involvement with
5 Mr. Zhirinovsky, Zhirinovsky's party and
6 Mr. Egiazaryan's role in it, did Mr. Akhmetshin ever
7 give you any other basis to suggest that
8 Mr. Egiazaryan was an anti-Semite?

9 A. I don't recall.

10 Q. During the course of the project did
11 anybody ever provide you with information suggesting
12 that Mr. Egiazaryan was an anti-Semite other than
13 Mr. Egiazaryan's involvement with Mr. Zhirinovsky
14 and Mr. Zhirinovsky's party and Mr. Egiazaryan's
15 role in it?

16 A. I don't recall.

17 Q. What were you told about Mr. Egiazaryan's
18 role in Mr. Zhirinovsky's party?

19 A. I was told that he was a Duma delegate, a
20 member of the Duma on that party's list, that he had
21 been a fundraiser, a prominent fundraiser for the
22 party and was a close associate of Mr. Zhirinovsky.

23 Q. Who told you this?

24 A. Mr. Akhmetshin, Mr. Zalmayev and some of
25 the research I had done I came across that.

1 Q. When Mr. Akhmetshin told you about
2 Mr. Egiazaryan's role with respect to
3 Mr. Zhirinovsky's party did he provide any evidence
4 of it to you?

5 A. He probably sent me some clippings or some
6 material.

7 Q. You say clippings or some material. You
8 mean newspaper clippings?

9 A. Media reports, perhaps some other
10 material.

11 Q. You say "he probably sent me some
12 clippings or some material." Do you have a
13 recollection as you sit here now that he did so on
14 this subject?

15 A. He sent me specific material showing
16 Mr. Egiazaryan's involvement with Mr. Zhirinovsky.

17 Q. What did those materials comprise?
18 Withdrawn.

19 What were those materials comprised of?

20 A. They were probably news clippings and
21 other statements gathered -- I don't know how they
22 were gathered -- that showed him, showed his
23 involvement.

24 Q. You say "other statements gathered." What
25 kind of statements?

1 A. For instance, by some human rights groups.

2 Q. Which human rights groups' statements were
3 you provided that demonstrated or illustrated
4 Mr. Egiazaryan's role in Mr. Zhirinovsky's party?

5 A. I don't recall.

6 Q. Other than the statements that you don't
7 recall and the newspaper clippings, was there any
8 other material provided to you by Mr. Akhmetshin
9 substantiating his claim with respect to
10 Mr. Egiazaryan's role in Mr. Zhirinovsky's party?

11 A. I don't know.

12 Q. I ask you the same series of questions
13 with respect to Mr. Zalmayev.

14 What evidence did Mr. Zalmayev provide to
15 you substantiating the claim with regard to
16 Mr. Egiazaryan's role in Mr. Zhirinovsky's party?

17 A. He probably sent me similar material.

18 Q. When you say "similar material," you mean
19 newspaper clippings?

20 A. And web pages.

21 Q. Do you recall what those newspaper
22 clippings were?

23 A. Not specifically.

24 Q. How about generally?

25 A. Generally speaking, generally reporting

1 that he was a member of Zhirinovsky's or was
2 involved in part of Zhirinovsky's party and he was a
3 deputy in that party, what we would call here a
4 caucus.

5 Q. What web pages did he point you to? By
6 "he" I'm talking about Mr. Zalmayev.

7 A. I don't recall. I copied some. You have
8 them.

9 Q. Other than the web pages and the newspaper
10 clippings, did Mr. Zalmayev provide you with any
11 other evidence to substantiate his contention with
12 respect to Mr. Egiazaryan's role in
13 Mr. Zhirinovsky's party?

14 A. I don't recall.

15 Q. Turning to item 15, second line on page
16 BA00484 of item 15, who is Felice Gaerr?

17 A. Apparently somebody with the
18 Antidefamation League.

19 Q. But you don't know her?

20 A. No, I do not.

21 Q. Do you know whether or not Mr. Akhmetshin
22 was able to procure support on this project from
23 Ms. Gaerr?

24 A. I don't know.

25 Q. Turning to 17 on that same page, I'm going

1 for the problems of the world.

2 MR. GOLDEN: I have no more

3 questions.

4 RE-DIRECT EXAMINATION:

5 BY MR. LUPKIN:

6 Q. During the course of your internet
7 research did you ever see any document or web page
8 indicating that Mr. Egiazaryan had been convicted of
9 any crimes?

10 A. I don't recall if he had been convicted of
11 anything. Charged.

12 Q. My question is convicted. Do you recall
13 seeing anything that --

14 A. I don't recall any convictions.

15 Q. During the course of your internet
16 research did you ever see any anti-Semitic
17 statements ascribed to him?

18 A. His association with the party was an
19 endorsement. Specific statements of anti-Semitism I
20 don't recall.

21 Q. My question is during the course of your
22 internet research did you ever see any anti-Semitic
23 statements ascribed to him?

24 A. I don't recall any direct statements.

25 MR. LUPKIN: I have no further